DESK STATEMENT – West Lake Landfill GCPT Survey 11/27/13

On October 28, 2013, contractors working under the oversight of EPA Region 7 began an engineering survey at the West Lake Landfill Superfund Site in Bridgeton, Mo. The purpose of the work is to survey an area between Bridgeton Sanitary Landfill and West Lake Landfill, at and below the ground's surface, using drilling and scanning equipment, to identify any radiologically-impacted material that may be present and ensure the area is suitable for future construction of the isolation barrier. This work is being performed by Feezor Engineering, Inc., a contracting firm hired by the potentially responsible parties at the Superfund site.

On November 25, 2013, Feezor Engineering delivered to EPA a preliminary update on the continuing Gamma Cone Penetrometer Testing (GCPT) phase of the survey. Based on preliminary, uncorrelated data that is subject to change upon further quality control checks, the GCPT has detected some radiologically-impacted material beneath the surface of the West Lake landfill at a handful of locations generally situated along one edge of the area being surveyed.

EPA Region 7 has received concerns from the Missouri Attorney General's Office and the Missouri Department of Natural Resources about this survey work. EPA is in agreement with the State of Missouri that the extent and location of radiologically-impacted material at the West Lake Landfill Site must be more closely defined. Accordingly, at EPA's direction and under its oversight, the potentially responsible parties have agreed to promptly expand and intensify their survey work to investigate for the presence of this material. The contractors performing the work and EPA staff conducting the oversight are following detailed health and safety plans that provide for their protection while the work continues. Additional health protections will be implemented should survey work warrant those additional protections.

The objective of the expanded survey is to identify any radiologically-impacted material that may be present in order to support safe construction in the near future of the isolation barrier between the West Lake and Bridgeton landfills. The barrier will isolate the West Lake landfill from the Bridgeton landfill sub-surface smoldering event. The expanded survey will allow the EPA to implement public-safety procedures in accordance with federal law to manage radiologically-impacted material that will now be located more precisely.

In its present location, this sub-surface material does not pose health risks to the public. It is many feet below the surface. The entire survey area is situated within a secured portion of the site closed to public access. Contractors and EPA Region 7 staff working at the site are following detailed health and safety plans that provide for their protection while this work continues.

When the survey is complete and all available data is finalized and subjected to quality control checks, EPA Region 7 will use this information to inform its decisions about the placement and design of an isolation barrier at the site. Detailed plans for construction of an isolation barrier are

expected to be developed early in 2014.